

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

LAURA HOLMAN,

*

Plaintiff

*

v.

*

Civil Action No.: _____

GREYHOUND LINES, INC., *et al.*,

*

Defendants

*

* * * * *

NOTICE OF REMOVAL

Petitioner/Defendant Greyhound Lines, Inc. (hereinafter “Greyhound”), by and through its undersigned attorneys, pursuant to 28 U.S.C. §1441 *et. seq.*, file this Notice of Removal of this action from the Circuit Court for Howard County, Maryland, in which it is now pending, to the United States District Court for the District of Maryland, and in support thereof respectfully avers as follows:

1. Petitioner/Defendant Greyhound has been named as a Defendant in a suit filed in the Circuit Court for Cecil County, Case No.: C-07-cv-20-000393. Plaintiff, Laura Holman (hereinafter “Plaintiff”) filed her Complaint naming Greyhound on November 25, 2020, and Petitioner/Defendant Greyhound was served that same day.

2. The above-entitled matter is a civil action in which Plaintiff seeks compensation against Petitioner/Defendant Greyhound for alleged bodily injury arising from a motor vehicle collision involving Petitioner/Defendant Greyhound and Co-Defendant, Just on Time Freight System, Inc. (“Just On Time”).

3. The above-entitled action is one in which this Court has original jurisdiction pursuant to Title 28 U.S.C. §1332. Petitioner/Defendant Greyhound seeks to remove this action to this Court under Title 28 U.S.C. §1441.

4. Plaintiff is a resident of New York, residing at 48 Monument Walk, #6D, Brooklyn, New York 11205.

5. Petitioner/Defendant Greyhound is incorporated in Texas and its principal corporate office is located at 250 North Saint Paul Street, Dallas, Texas 75201.

6. Co-Defendant Just on Time is incorporated in Canada and has its principal place of business at 80 Summerlea Road, Brampton, ON LGT 4X3.

7. Petitioner/Defendant Greyhound is entitled to removal because there is complete diversity of citizenship between the Plaintiff and the Defendants and the amount in controversy exceeds \$75,000.00.

8. Co-Defendant Just on Time consents to Petitioner/Defendant Greyhound's request for removal.

9. Pursuant to Local Rule 103.5(a) filed herewith are copies of the (1) Writ of Summons, (2) Complaint & Demand for Jury Trial and (3) Greyhound's Answer to the Complaint as Exhibits 1-3 respectively.

WHEREFORE, Petitioner/Defendant Greyhound respectfully requests that the above-entitled action be removed from the Circuit Court for Cecil County, Maryland to the United States District Court for the District of Maryland.

Respectfully submitted,

/s/

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Attorneys for Defendant, Greyhound Lines, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of January 2021 a copy of the foregoing Notice of Removal was e-filed with the Court's ECF system and sent by first class mail, to:

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/s/

Scarlett M. Corso